



04/11/2022

Foster Wheeler Energy Corporation  
 Frederick Wolsky Legal Asbestos Litigation  
 Amec Foster Wheeler Limited  
 53 Frontage Road  
 Hampton NJ 08827

## SERVICE OF PROCESS NOTICE

Item: 2022-631

The following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard.

1.	<b>Entity Served:</b>	Foster Wheeler Energy Corporation
2.	<b>Title of Action:</b>	Rita Wright, et al. vs. ABB, Inc., et al.
3.	<b>Document(s) Served:</b>	Law Firm Letter Civil Cover Sheet Notice to Plead Defendant's Service List
4.	<b>Court/Agency:</b>	Philadelphia County Common Pleas Court, Pennsylvania
5.	<b>State Served:</b>	New Jersey
6.	<b>Case Number:</b>	220302742
7.	<b>Case Type:</b>	Asbestos
8.	<b>Method of Service:</b>	Hand Delivered
9.	<b>Date Received:</b>	Wednesday 04/06/2022
10.	<b>Date to Client:</b>	Monday 04/11/2022
11.	<b># Days When Answer Due:</b> <b>Answer Due Date:</b>	20 Tuesday 04/26/2022
		<b>CAUTION:</b> Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.
12.	<b>Sop Sender:</b> (Name, City, State, and Phone Number)	Meiowitz & Wasserberg Newark, NJ 800-726-6326
13.	<b>Shipped To Client By:</b>	Email Only with PDF Link
14.	<b>Tracking Number:</b>	
15.	<b>Handled By:</b>	311
16.	<b>Notes:</b>	Please note an unexpected delay in delivery of the document was experienced due to an unusual handling and delivery by our courier service. We apologize for any inconvenience Also Attached: * Civil Action Complaint * Schedule 1, etc.

NOTE: This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At ComputerShare, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by United Agent Group Inc.



March 30, 2022

**Via Hand Delivery**

FOSTER WHEELER ENERGY CORPORATION  
PERRYVILLE CORPORATE PARK  
HAMPTON NJ 08827

To Whom It May Concern:

Enclosed please find the CIVIL COVER SHEET, COMPLAINT, AND MASTER CASE MANAGEMENT ORDER in the following matter:

- GERALD WRIGHT, v. ABB INC., et. al., (Case No.: 220302742)

If you have any questions, regarding this service please feel free to contact us at **(212) 897-1988**. Thank you.

Very truly yours,

*Chelsea Roman*  
Chelsea Roman  
Receptionist

Meiowitz & Wasserberg, LLP [mwinjurylaw.com](http://mwinjurylaw.com) [samndan.com](http://samndan.com)

CALL TOLL FREE 1-800-SAM N DAN (1-800-726-6326) Office: 212-897-1988 Fax: 646-432-6887

New York 1040 Sixth Avenue, Suite 12B, New York, NY 10018

Bronx 332 East 149th Street, Suite 201, Bronx, NY 10457 Pennsylvania 24 Veterans Square, Media, PA 19335

Long Island 160 Broadhollow Road, Suite 208-A, Melville, NY 11747 Florida 101 NE 3rd Avenue, Suite 1500, Fort Lauderdale, FL 33301

New Jersey 201 Washington Street, 2nd Floor, Newark, NJ 07102 Texas 2925 Richmond Avenue, Suite 1225, Houston, TX 77098

Samuel Meiowitz licensed in NY, NJ, PA & FL | Daniel Wasserberg licensed in NY, NJ, TX & IL

Kush Shukla licensed in NY, NJ, & IL | Perry Shusterman licensed in NY & NJ | Jonathan Alvarez licensed in NJ

Donna Kristal Egner licensed in NY, NJ, & IL | Matthew Wurgaft licensed in NY & NJ | Bonnie Steinwolf licensed in NY

Carla Pinto licensed in NJ | Neidra Wilson licensed in NJ & PA | Laurita Rodriguez licensed in NY

Court of Common Pleas of Philadelphia County  
Trial Division

## Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

**MARCH 2022**

**002742**

E-Filing Number: 2203058986

PLAINTIFF'S NAME RITA WRIGHT	DEFENDANT'S NAME ABB, INC.
PLAINTIFF'S ADDRESS 534 FAGLESVILLE ROAD PERKIOMENVILLE PA 18074	DEFENDANT'S ADDRESS CORPORATION SERVICE COMPANY 600 N. 2ND STREET, SUITE 401 HARRISBURG PA 17101
PLAINTIFF'S NAME GERALD WRIGHT	DEFENDANT'S NAME AIR & LIQUID SYSTEMS CORPORATION
PLAINTIFF'S ADDRESS 534 FAGLESVILLE ROAD PERKIOMENVILLE PA 18074	DEFENDANT'S ADDRESS CORPORATION SERVICE COMPANY 2595 INTERSTATE DRIVE SUITE 103 HARRISBURG PA 17110
PLAINTIFF'S NAME	DEFENDANT'S NAME CARRIER CORPORATION
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS CT CORPORATION SYSTEMS 600 N. 2ND STREET, SUITE 401 HARRISBURG PA 17101

TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 31	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Notice of Appeal 
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AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other:  <input checked="" type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition	COMMENCEMENT OF ACTION <input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals	Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival
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CASE TYPE AND CODE T1 - MASS TORT - ASBESTOS
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STATUTORY BASIS FOR CAUSE OF ACTION 
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RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	FILED PRO PROTHY MAR 28 2022 S. RICE	IS CASE SUBJECT TO COORDINATION ORDER? YES      NO
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### TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: RITA WRIGHT, GERALD WRIGHT

Papers may be served at the address set forth below.

NAME OF PLAINTIFF/S/PETITIONER/S/APPELLANT'S ATTORNEY JENNA K. EGNER	ADDRESS MEIROWITZ & WASSERBERG, LLP 535 FIFTH AVENUE 23RD FLOOR NEW YORK NY 10017
PHONE NUMBER (212) 897-1988	FAX NUMBER none entered
SUPREME COURT IDENTIFICATION NO. 319075	E-MAIL ADDRESS jenna@mwinjurylaw.com
SIGNATURE OF FILING ATTORNEY OR PARTY JENNA EGNER	DATE SUBMITTED Monday, March 28, 2022, 10:03 am

**COMPLETE LIST OF DEFENDANTS:**

1. ABB, INC.  
CORPORATION SERVICE COMPANY 600 N. 2ND STREET, SUITE 401  
HARRISBURG PA 17101
2. AIR & LIQUID SYSTEMS CORPORATION  
CORPORATION SERVICE COMPANY 2595 INTERSTATE DRIVE SUITE 103  
HARRISBURG PA 17110
3. CARRIER CORPORATION  
CT CORPORATION SYSTEMS 600 N. 2ND STREET, SUITE 401  
HARRISBURG PA 17101
4. CBS CORPORATION  
ALIAS: F/K/A WESTINGHOUSE ELECTRIC CORPORATION  
600 GRANT STREET  
PITTSBURGH PA 15219
5. COOPER CROUSE-HINDS  
500 NORTH 7TH STREET  
SYRACUSE NJ 13221
6. CLEAVER BROOKS COMPANY, INC.  
CORPORATION SERVICE COMPANY 2595 INTERSTATE DRIVE SUITE 103  
HARRISBURG PA 17110
7. CRANE CO.  
CT CORPORATION SYSTEMS 600 N. 2ND STREET, SUITE 401  
HARRISBURG PA 17101
8. EATON CORPORATION  
ALIAS: SII CUTLER-HAMMER, INC.  
CT CORPORATION SYSTEM 600 N. 2ND STREET, SUITE 401  
HARRISBURG PA 17101
9. FOSTER WHEELER ENERGY CORPORATION  
PERRYVILLE CORPORATE PARK  
HAMPTON NJ 08827
10. GENERAL ELECTRIC COMPANY  
75 SAM FONZO DRIVE  
BEVERLY MA 01915
11. GOULD ELECTRONICS, INC.  
CT CORPORATION SYSTEM 4400 EASTON COMMONS WAY  
COLUMBUS OH 43219
12. GOULDS PUMPS, INC.  
240 FALLS ST.  
SENECA FALLS NY 13147
13. GRINNELL LLC  
CT CORPORATION 28 LIBERTY STREET, 42ND FLOOR  
NEW YORK NY 10005
14. HAJOCA CORPORATION  
CORPORATION SERVICE COMPANY 80 STATE STREET  
ALBANY NY 12207
15. HONEYWELL INTERNATIONAL INC.  
ALIAS: SII ALLIED SIGNAL, INC., AND BENDIX CORPORATION  
2595 INTERSTATE DRIVE #103  
HARRISBURG PA 17110
16. HOWDEN NORTH AMERICA, INC.  
ALIAS: SII BUFFALO FORGE COMPANY  
CT CORPORATION SYSTEM 2 OFFICE PARK COURT, SUITE 103  
COLUMBIA SC 29223
17. IMO INDUSTRIES, INC.  
THE CORPORATION TRUST COMPANY 1209 NORTH ORANGE STREET  
WILMINGTON DE 19801
18. ITT CORPORATION  
ALIAS: SII TO BELL & GOSSETT AND KENNEDY VALVES  
CT CORPORATION 28 LIBERTY STREET  
NEW YORK NY 10005
19. KEELER-DORR-OLIVER BOILER COMPANY  
MARON & MARVEL 1201 N. MARKET ST., #900  
WILMINGTON DE 19801
20. KILLARK

2112 FENTON LOGISTICS PARK BLV  
FENTON MO 63026

21. MINNESOTA MINING & MANUFACTURING COMPANY  
ALIAS: AKA 3M COMPANY  
CORPORATION SERVICE COMPANY 801 ADLAI STEVENSON DRIVE  
SPRINGFIELD IL 62703

22. MIDDENDORF ENTERPRISES, INC.  
121 VALLEY ROAD  
ARDMORE PA 19003

23. NOSROC CORP.  
ALIAS: SII G. & W.H. CORSON  
CT CORPORATION 600 NORTH 2ND STREET SUITE 401  
HARRISBURG PA 17101

24. PROCESS WATER SYSTEMS, INC.  
ALIAS: SII TO U.S. FILTER/PERMUTIT, INC.  
CORPORATION TRUST CENTER 1209 ORANGE STREET  
NEW CASTLE DE 19801

25. QUEEN CASUALS INC. AS A SUBSIDIARY OF INTERCO, INC.  
PRENTICE-HALL CORPORATION SYST 2595 INTERSTATE DRIVE SUITE 103  
HARRISBURG PA 17110

26. ROCKWELL AUTOMATION, INC.  
ALIAS: SUCCESSOR TO ALLEN BRADLEY  
CT CORPORATION SYSTEM 28 LIBERTY STREET, 42ND FLOOR  
NEW YORK NY 10005

27. SIEMENS INDUSTRY, INC.  
CT CORPORATION SYSTEM 28 LIBERTY STREET, 42ND FLOOR  
NEW YORK NY 10005

28. SCHNEIDER ELECTRIC USA, INC.  
ALIAS: F/K/A SQUARE D COMPANY  
CORPORATION SERVICE COMPANY 80 STATE STREET  
ALBANY NY 10118

29. UNION CARBIDE CORPORATION  
CT CORPORATION 28 LIBERTY STREET, 42ND FLOOR  
NEW YORK NY 10005

30. WARREN PUMPS LLC  
THE CORPORATION TRUST COMPANY 1209 ORANGE STREET  
WILMINGTON DE 19801

31. ZURN INDUSTRIES, INC.  
CT CORPORATION SYSTEM 28 LIBERTY STREET, 42ND FLOOR  
NEW YORK NY 10005

**MEIROWITZ & WASSERBERG, LLP**

Jenna Kristal Egner, Esq.  
Attorney ID No. 319075  
24 Veterans Square  
Media, PA19063  
(212) 897-1988  
*Attorneys for Plaintiffs*

Filed and Accepted by the  
Office of Judicial Records  
28 MAR 2022 10:53 am



**RITA WRIGHT and GERALD WRIGHT, h/w,**

**Plaintiffs,**

**v.**

**ABB, INC., et al.,**

**Defendants.**

**PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
CIVIL TRIAL DIVISION**

**MARCH TERM 2022  
NO.**

**ASBESTOS CASE  
JURY TRIAL DEMANDED**

**NOTICE TO PLEAD**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION  
LAWYER REFERRAL AND INFORMATION SERVICE  
One Reading Center  
Philadelphia, Pennsylvania 19107  
Telephone: 215-238-1701

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELPHIA  
SERVICIO DE DEFERENCIA E INFORMACIÓN LEGAL  
One Reading Center  
Filadelfia, Pennsylvania 19107  
Telephone: 215-238-1701

**MEIROWITZ & WASSERBERG, LLP**

Jenna Kristal Egner, Esq.

Attorney ID No. 319075

24 Veterans Square

Media, PA19063

(212) 897-1988

*Attorneys for Plaintiffs*

**RITA WRIGHT and GERALD WRIGHT, h/w,**

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**ABB, INC., *et al.*,**

Defendants.

**PHILADELPHIA COUNTY  
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CIVIL TRIAL DIVISION**

**MARCH TERM 2022**

**NO.**

**ASBESTOS CASE  
JURY TRIAL DEMANDED**

**DEFENDANT'S SERVICE LIST**

**ABB, INC.**

Corporation Service Company

600 N. 2nd Street, Suite 401

Harrisburg, PA 17101

**AIR & LIQUID SYSTEMS CORPORATION**

Corporation Service Company

2595 Interstate Drive, Suite 103

Harrisburg, PA 17110

**CARRIER CORPORATION**

CT Corporation Systems

600 N. 2nd Street, Suite 401

Harrisburg, PA 17101

**CBS CORPORATION, f/k/a VIACOM INC.,  
successor by merger to CBS CORPORATION,  
f/k/a WESTINGHOUSE ELECTRIC CORPORATION**  
Asbestos Litigation Support Manager  
Eckert Seamans Cherin & Mellott, LLC  
Case Management & Technology Center USX Towers  
600 Grant Street  
Pittsburgh, PA 15219

**COOPER CROUSE-HINDS**

500 North 7th Street  
Syracuse, NY 13221

**CLEAVER BROOKS COMPANY, INC.**

Corporation Service Company  
2595 Interstate Drive, Suite 103  
Harrisburg, PA 17110

**CRANE CO.**

CT Corporation Systems  
600 N. 2nd Street, Suite 401  
Harrisburg, PA 17101

**EATON CORPORATION,**

**Individually and as successor in interest to CUTLER-HAMMER, INC.**  
CT Corporation System  
600 N. 2nd Street, Suite 401  
Harrisburg, PA 17101

**FOSTER WHEELER ENERGY CORPORATION**

Perryville Corporate Park  
Hampton NJ 08827

**GENERAL ELECTRIC COMPANY**

75 Sam Fonzo Drive  
Beverly, MA 01915

**GOULD ELECTRONICS, INC.**

CT Corporation System  
4400 Easton Commons Way  
Columbus, OH 43219

**GOULDS PUMPS, INC.**

240 Falls St.  
Seneca Falls, NY 13147

**GRINNELL LLC**

CT Corporation  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**HAJOMA CORPORATION**

Corporation Service Company  
80 State Street  
Albany, NY 12207

**HONEYWELL INTERNATIONAL INC.**

**as Successor in Interest to Allied Signal, Inc., and Bendix Corporation**  
2595 Interstate Drive #103  
Harrisburg, PA 17110

**HOWDEN NORTH AMERICA, INC.**

**as Successor in Interest to Buffalo Forge Company**  
CT Corporation System  
2 Office Park Court, Suite 103  
Columbia, SC 29223

**IMO INDUSTRIES, INC.**

The Corporation Trust Company  
1209 North Orange Street  
Wilmington, DE 19801

**ITT CORPORATION,**

**Individually and as Successor-in-Interest to Bell & Gossett and Kennedy Valves**  
CT Corporation  
28 Liberty Street  
New York, NY 10005

**KEELER-DORR-OLIVER BOILER COMPANY**

Wayne A. Marvel, Esq  
Maron & Marvel  
1201 N. Market St., #900  
Wilmington, DE 19801

**KILLARK**

2112 Fenton Logistics Park Blvd.  
Fenton, MO 63026

**MINNESOTA MINING & MANUFACTURING COMPANY,  
a/k/a 3M COMPANY**  
Corporation Service Company  
801 Adlai Stevenson Drive  
Springfield, IL 62703

**MIDDENDORF ENTERPRISES, INC.**  
121 Valley Road  
Ardmore, PA 19003

**NOSROC CORP.,**  
**Individually and as Successor in Interest to G. & W.H. CORSON**  
CT Corporation  
600 North 2nd Street, Suite 401  
Harrisburg, PA 17101

**PROCESS WATER SYSTEMS, INC.,**  
**Individually and as Successor in interest to U.S. Filter/Permutit, Inc.**  
Corporation Trust Center  
1209 Orange Street  
New Castle, DE 19801

**QUEEN CASUALS INC. AS A SUBSIDIARY OF INTERCO, INC.**  
Prentice-Hall Corporation System, Inc.  
2595 Interstate Drive, Suite 103  
Harrisburg, PA 17110

**ROCKWELL AUTOMATION, INC.,**  
**Individually and as Successor to ALLEN BRADLEY**  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**SIEMENS INDUSTRY, INC.**  
CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**SCHNEIDER ELECTRIC USA, INC.,**  
**formerly known as SQUARE D COMPANY**  
Corporation Service Company  
80 State Street  
Albany, NY 10118

**UNION CARBIDE CORPORATION**

CT Corporation  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**WARREN PUMPS LLC**

The Corporation Trust Company  
1209 Orange Street  
Wilmington, DE 19801

**ZURN INDUSTRIES, INC.**

CT Corporation System  
28 Liberty Street, 42nd Floor  
New York, NY 10005

**MEIROWITZ & WASSERBERG, LLP**

Jenna Kristal Egner, Esq.

Attorney ID No. 319075

24 Veterans Square

Media, PA19063

(212) 897-1988

*Attorneys for Plaintiffs*

**RITA WRIGHT and GERALD WRIGHT, h/w,**

**Plaintiffs,**

**v.**

**ABB, INC., *et al.*,**

**Defendants.**

**PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
CIVIL TRIAL DIVISION**

**MARCH TERM 2022  
NO.**

**ASBESTOS CASE  
JURY TRIAL DEMANDED**

**CIVIL ACTION COMPLAINT**

Plaintiffs incorporate by reference Plaintiffs Master Long Form Complaint In re: Asbestos litigation in Philadelphia County Court of Common Pleas, filed as of October Term 1986, No. 8610-0001. Pursuant to an Order dated July 30, 1986, and signed by the Honorable Richard B. Klein, the following Short Form Complaint is utilized in this asbestos action.

1. This Complaint involves the claims of the following persons:

Plaintiff:

Name: Rita Wright

Address: 534 Faglesville Road, Perkiomenville, PA 18074

Date of Birth: 11/10/1929

Spouse Plaintiff:

Name: Gerald Wright

Address: 534 Faglesville Road, Perkiomenville, PA 18074

Date of Birth: 07/10/1926

2. The Defendants are those companies listed in the caption.

3. Plaintiffs may have named as defendants other entities that may be responsible for the manufacture, distribution, sale and/or supply of products that contained asbestos, except that each of these entities has filed for relief or been forced into involuntary bankruptcy under the United

States Bankruptcy Code and, pursuant to federal statute, the institution of actions against these entities is stayed.

4. Plaintiffs hereby incorporate by reference the following County from the Master Long Form Complaint: Counts I, II, III, IV, V, VI, VII and X.

5. Plaintiff, Rita Wright's employment history, to the extent possible at this time, is attached hereto as Schedule 1.

6. Plaintiff was diagnosed on or about March 2022 with mesothelioma which was substantially caused by her exposure to asbestos.

7. Plaintiff, Rita Wright is a non-smoker.

8. A claim for lost wages will be asserted at time of trial, if applicable.

**WHEREFORE**, Plaintiffs pray for judgment against the Defendants and each of them individually, jointly, and severally for compensatory damages in an amount in excess of fifty thousand dollars (\$50,000), punitive damages and all such damages and relief as this Honorable Court deems just and proper.

**MEIROWITZ & WASSERBERG, LLP**  
*Attorneys for Plaintiffs*

/s/ *Jenna Kristal Egner*  
Jenna Kristal Egner, Esq.

**SCHEDULE 1**  
**PLAINTIFFS' WORK HISTORY**

Plaintiff Rita Wright was exposed to asbestos from her husband who served in the Navy and worked at the Philadelphia Naval Shipyard. This work exposed Plaintiff to asbestos from insulation, cement, pumps, valves, boilers, firebrick, gaskets, packing, pipe covering, pipe insulation, electrical equipment, parts and components. Plaintiff was also exposed to asbestos when she worked as a seamstress at the Queen Casuals and Middendorf.

Plaintiff, Rita Wright				
<b>Employer</b>	<b>Location</b>	<b>From</b>	<b>To</b>	<b>Job Title</b>
Middendorf's	Philadelphia, PA	1945	1946	Seamstress
Queen Casuals	Philadelphia, PA	1947	1953	Seamstress

Plaintiff, Gerald Wright				
<b>Employer</b>	<b>Location</b>	<b>From</b>	<b>To</b>	<b>Job Title</b>
Allied Electric	Philadelphia, PA	1953	1988	Electrician

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION - CIVIL

WRIGHT ETAL VS ABB, INC.  
ETAL

2022 TERM MARCH

No. 02742

IN RE: ASBESTOS LITIGATION - OCTOBER TERM 1986, NO. 0001

**MASTER CASE MANAGEMENT ORDER FOR  
ASBESTOS-RELATED PERSONAL INJURY CLAIMS**

It is the goal of this Court to secure the just, expeditious and cost-effective determination of each personal injury case involving exposure to asbestos or asbestos-containing products pending or hereafter filed in the Court of Common Pleas of Philadelphia County to eliminate duplication of effort, prevent unnecessary paperwork and promote judicial economy.

In order to achieve these objectives, this 1st day of December, 2010, the Court enters the following Case Management Order for personal injury cases involving exposure to asbestos or asbestos-containing products.

This Case Management Order supersedes all prior Case Management Orders entered in the Asbestos Litigation and shall apply to all cases currently pending and hereafter filed in this Court.

**I. PLEADINGS**

**A. Short Form Complaints**

A Short Form Complaint shall be filed and served in every case in accordance with the Pennsylvania Rules of Civil Procedure. Plaintiffs may incorporate by reference the Master Long Form Complaints filed on the above-captioned docket.

The Short Form Complaint shall contain the information required by Philadelphia Civil Rule \*1019.1(B), to the extent consistent with the Pennsylvania Rules of Civil Procedure.

A Short Form Complaint that contains premises liability claims shall include the name and address of each work site in which the plaintiff alleges exposure to asbestos and the dates during which the plaintiff or the decedent worked at each such work site.

**B. Preliminary Objections**

In response to each Short Form Complaint, the defendant may file preliminary objections, if deemed appropriate, in accordance with the Pennsylvania Rules of Civil Procedure and Philadelphia Civil Rule \*1028. The preliminary objections shall be filed in letter brief format rather than motion package format. Its caption must specify "Asbestos Litigation" and name opposing counsel. Facts, issues and pertinent case law should be included. Each motion must include a proposed order.

**C. Answers to Complaints**

Defendant's answers to complaints are governed by Rule 1041.1 of the Pennsylvania Rules of Civil Procedure.

## II. GIFFEAR DOCKET

Cases that do not state a valid claim pursuant to Giffear v. Johns-Manville Corp., 632 A.2d 880 (Pa.Super. 1993), aff'd sub nom. Simmons v. Pacor, Inc., 674 A.2d 232 (Pa.1996), shall be placed on an inactive docket.

To reactivate a case which has been discontinued pursuant to Giffear, a Motion to Reactivate must be filed and include all necessary medical reports supporting said motion. The motion shall be filed in letter brief format consistent with the Mass Tort Motion procedures.

## III. DISCOVERY

The following deadlines shall apply for the completion of discovery and the exchange of expert reports:

### 180 Days prior to jury selection-

Plaintiffs shall serve answers to Defendants' Master Interrogatories and Requests for Production Directed to Plaintiffs, including information relating to Bankruptcy Trust Filings.

Plaintiffs shall forward the identification of all health care providers along with addresses to defense counsel and RecordTrak.

Plaintiffs shall forward HIPAA compliant authorizations signed by plaintiffs to RecordTrak.

### 120 days prior to jury selection-

Plaintiffs shall serve medical, economic and liability expert reports.

Plaintiffs shall produce to lead defense counsel all diagnostic materials in the possession of plaintiffs or their counsel and all diagnostic material reviewed by plaintiffs' experts. This includes, but is not limited to, x-rays, CT scans, pathology and cytology.

Plaintiffs shall serve product identification witness lists identifying the defendants the witnesses are expected to identify.

100 days prior to jury selection-- Completion of plaintiffs' depositions.

90 days prior to jury selection-- Completion of all co-worker depositions.

45 days prior to jury selection-- Defendants shall serve medical and economic expert reports.

10 days prior to jury selection-- Defendants shall serve expert liability reports.

## IV. STIPULATIONS OF DISMISSAL

1. If a plaintiff has agreed to stipulate to the dismissal of a defendant, the defendant (hereinafter the "Stipulated Defendant") shall prepare a Stipulation of Dismissal.
2. The Stipulated Defendant shall circulate the Stipulation of Dismissal to all defense

counsel by letter, stating that any party has ten (10) days from the date of the letter to object to the dismissal of the Stipulated Defendant.

3. If a party objects to the dismissal of the Stipulated Defendant, the objecting party shall notify the Stipulated Defendant in writing of the basis for the objection.

4. If, after the expiration of the ten (10) day period, no objections are received by the Stipulated Defendant, the Stipulation of Dismissal may be electronically filed with the Court as unopposed.

5. The package electronically filed with the Court shall include the signed Stipulation of Dismissal and a cover letter stating no objections have been raised within the ten (10) day period.

6. Service of the Court-approved Stipulation of Dismissal shall be effectuated via the Court's electronic filing system on all parties of record.

## **V. MOTION PRACTICE AND PROCEDURE**

All summary judgment motions shall be filed in accordance with the Revised Asbestos Summary Judgment Motion Procedures, a copy of which is attached hereto. In addition, to prevent the filing of unnecessary motions, five (5) days prior to the deadline for filing summary judgment motions (or 85 days prior to jury selection) Plaintiffs' counsel are to serve upon all parties to a case, a 'Dismissal Letter' indicating all defendants which Plaintiff will voluntarily dismiss from that case.

All other motions, including motions for *forum non conveniens*, motions to amend complaints, motions to compel, motions to enforce settlements, etc., shall be filed in accordance with the Revised Mass Tort Motion Procedures, a copy of which is attached hereto.

## **VI. TRIAL SCHEDULING**

The dates for all scheduled trials will be published each Monday in *The Legal Intelligencer*.

## **VII. DEADLINES FOR CASES THAT MOVE TO NEW TRIAL GROUPS**

If any case is moved, with the consent of the Court, from its original trial group to a later trial group, all discovery and motions deadlines for the later group will apply. Any summary judgment motions filed prior to moving the case will be considered moot and must be re-filed in accordance with the deadlines for the group to which the case has been moved, except for cases where the motion deadline for the new group has already passed at the time the case is moved. For those cases, motions will remain open and need not be re-filed. Those motions remaining open shall be decided by the Coordinating Judge in accordance with the deadlines for the new group.

## **VIII. CALL OF THE LIST**

A brief call of the asbestos list will be conducted every Monday at 11:00 a.m. The Court will conduct general asbestos business and call those cases listed for trial for the following month. Knowledgeable representatives of each party involved in the next month's scheduled trials shall attend.

A meeting of the Asbestos Kitchen Cabinet will be conducted on the first Monday of each month, following the call of the list.

## **IX. SANCTIONS**

Failure to comply with any deadlines set forth in the Case Management Order may result in the imposition of appropriate sanctions, including dismissal.

SSOS 80 RRA

**BY THE COURT:**

**ARNOLD L. NEW  
TEAM LEADER**

APR 06 2022